



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 22, 2022

BY ECF

Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Application granted. The conference is adjourned to October 14, 2022 at 4:00 p.m. Time is excluded until October 14, 2022, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

SO ORDERED.

**Re: *United States v. Niloufar Bahadorifar et al.,*
S1 21 Cr. 430 (RA)**

Dear Judge Abrams:


Ronnie Abrams, U.S.D.J.

August 23, 2022

The Government respectfully submits this status letter with respect to the conference scheduled for August 26, 2022. The Government has conferred with counsel for the defendant, and the parties propose to adjourn the conference for approximately 45 days. The parties have been engaged in discussions about a possible resolution of this matter. (See Dkt. No. 35). The primary purpose of the proposed adjournment is to continue those discussions with the expectation that, by the next status conference, the parties will be able to advise the Court whether the parties have reached a disposition or, if not, to request that the Court set a motions schedule.

Should the request be granted, the Government requests that time be excluded under the Speedy Trial Act until the date of the adjourned conference. Defense counsel consents to this request. The ends of justice served by the requested exclusion outweigh the best interests of the public and the defendant in a speedy trial because it will permit the defendant and her counsel time to review discovery, to consider potential pretrial motions, and to consider a potential disposition of the matter. See 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____ /s/
Michael D. Lockard / Matthew J.C. Hellman
/ Jacob H. Gutwillig
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cc: Counsel of record (by ECF)